

## ORIGINAL EX PARTE OR LATE FILED

May 18, 2000

Honorable William E. Kennard, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Ex Parte contact in CC Docket Nos. 96-262,/94-1, 99-249 and 96-45

Dear Chairman Kennard:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Southwestern University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Southwestern University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

The weighted average MLB PICC found in ILEC tariffs is about \$2.50 per line per month. The MLB PICC levied by major long distance carriers, however, is about \$4.00 per line per month. The long distance carriers claim that the PICCs that they charge only recover their costs, even though their mark-up exceeds fifty-five percent. Business users, including educational institutions, should not be required to bear this dead weight loss any longer.

To avoid the mark-up and the associated dead-weight economic loss, the pending CALLS proposal should be amended to include a LEC billed Multi-Line Business Super SLC. The MLB Super SLC would be an amount equal to the sum of what would have been the MLB SLC and the ILEC billed MLB PICC. This suggestion would not reduce by one penny the subsidy to residential loops, and would have no adverse revenue impact on any signatory to the CALLS plan if their representations about the MLB PICC are truthful.

Sincerely,

Robert C. Paver, Associate Vice President Information Technology Services

Robert C. Paver

Southwestern University

Cc: Secretary, Federal Communications Commission

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May 18, 2000

Honorable Michael K. Powell, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Commissioner Powell:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Southwestern University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Southwestern University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Robert C. Paver, Associate Vice President Information Technology Services

Southwestern University

Robert C. Pa

Cc: Secretary, Federal Communications Commission

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May 18, 2000

Honorable Susan Ness, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Commissioner Ness:

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Robert C. Paver, Associate Vice President

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Information Technology Services

Southwestern University

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## ORIGINAL EX PARTE OR LATE FILED

May 18, 2000

Honorable Harold Furchtgott-Roth, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Commissioner Furchtgott-Roth 1:

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Sincerely,

Robert C. Paver, Associate Vice President

Robert C. Paver

Information Technology Services

Southwestern University

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## EX PARTE OR LATE FILED

May 18, 2000

Honorable Gloria Tristani, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

## Dear Commissioner Tristani:

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Robert C. Paver, Associate Vice President Information Technology Services

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